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October 21, 2021

Via ECF

Honorable Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 443
New York, New York 10007

RE: ***In re Navidea Biopharmaceuticals Litigation, Case No. 19-cv-01578-VEC***

Dear Judge Caproni:

We represent Plaintiff Navidea Biopharmaceuticals, Inc. and Third-Party Defendant Macrophage Therapeutics, Inc. in the above-referenced matter. Pursuant to the Court's Individual Rule 2.C and the So-Ordered Stipulation Regarding Expert Discovery, dated September 23, 2021 (ECF No. 228), we write to request an extension of time to submit a stipulation setting forth the date, time, and location of the depositions of the experts in this matter. The parties are in the process of deciding the specific date, time, and location of the depositions but require additional time for scheduling because certain expert witnesses are located out of state. The parties will continue to discuss and respectfully request that the time to file a stipulation on the date, time, and location of the depositions of the experts be extended from October 22, 2021, to October 25, 2021. Defendant Dr. Michael M. Goldberg has consented to this request.

Respectfully submitted,



Barry M. Kazan

cc: Alain Baudry, Esq. (via ECF)
Karim Sabbidine, Esq. (via ECF)
Gregory Zimmer, Esq. (via ECF)